
UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CARLOS GOODEN PhD,

Plaintiff(s),

v.

THE UNIVERSITY OF HOUSTON
SYSTEM AND THE UNIVERSITY OF
HOUSTON-DOWNTOWN,

Defendant(s).

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No. 4:23-cv-01987

**PLAINTIFF'S APPENDIX IN SUPPORT OF RESPONSE IN
OPPOSITION TO DEFENDANTS THE UNIVERSITY OF HOUSTON SYSTEM
AND THE UNIVERSITY OF HOUSTON-DOWNTOWN'S
MOTION FOR SUMMARY JUDGMENT**

Plaintiff Dr. Carlos Gooden submits and incorporates by reference, this appendix in support of his Response in Opposition to Defendants The University of Houston System and the University of Houston-Downtown's Motion for Summary Judgment (Dkt. 44) filed herewith.

Evidence

- Exhibit 1 Littler's Second Preliminary Report of Investigation Regarding Allegations of Violations of Anti-Discrimination Policy and Sexual Misconduct Policy Dated February 2023 (UHS/UHD 144-231)
- Exhibit 2 Dean Gengler's Offer Letter (UHS/UHD 21487-21490)
- Exhibit 3 Dean Gengler's Tenure Decision (UHS/UHD 21485-21486)
- Exhibit 4 Prior Formal Complaint Against Dean Gengler Re: Jan. 28, 2019 Incident (UHS/UHD 2394-2406)

- Exhibit 5 Results of Prior Formal Complaint Re: Jan. 28, 2019 Incident (UHS/UHD 2389-2391)
- Exhibit 6 Prior Complaint Memo Re: June 2, 2020 Incident (UHS/UHD 2411-2425)
- Exhibit 7 Results of Prior Complaint Memo Re: June 2, 2020 Incident (UHS/UHD 2408-2409)
- Exhibit 8 Dr. Gooden's Offer Letter (UHS/UHD 1054-1056)
- Exhibit 9 Dr. Carlos Gooden Deposition
- Exhibit 9A LinkedIn of White Heterosexual Male Comparators- Professors in Marilyn Davies College of Business
- Exhibit 10 Plaintiff Carlos Gooden, PhD's Objections and Responses to Defendants' Second Set of Interrogatories, No. 16
- Exhibit 11 Dr. Gooden's Formal Complaint Dated 4/25/2022 (UHS/UHD 1550-1568)
- Exhibit 12 Female Coordinator's Report to Defendants About Dean Gengler (UHS/UHD 21351-21356)
- Exhibit 13 Formal Page to Dr. Gooden's Formal Complaint Dated 4/28/2022 (UHS/UHD 1552)
- Exhibit 14 Lauri Ruiz Deposition
- Exhibit 15 Noel Baldovino Formal Complaint Re: May 19, 2022 Incident (UHS/UHD 1570-1573)
- Exhibit 16 Noel Baldovino Deposition
- Exhibit 17 Darren Gibson Deposition
- Exhibit 18 Memorandum from Dr. Akif Uzman Interim Senior Vice President for Academic and Student Affairs to Dean Gengler Pursuant to Littler's Recommendation Dated May 23, 2022 (UHS/UHD 2132)

- Exhibit 19 Littler's Memorandum to Dr. Akif Uzman Interim Senior Vice President for Academic and Student Affairs RE: Recommend Administrative Leave for Dean Gengler and Mutual No Contact Order (UHS/UHD 2132)
- Exhibit 20 Title IX Officer's Communication to Littler Mendelson (UHS/UHD 21434)
- Exhibit 21 Preliminary Report of Investigation Regarding Allegations of Violations of Anti-Discrimination Policy and Sexual Misconduct Policy Dated November 11, 2022 (UHS/UHD 2858-2930)
- Exhibit 22 Preliminary Report of Investigation Regarding Allegations of Violations of Anti-Discrimination Policy and Sexual Misconduct Policy Dated November 28, 2022 (UHS/UHD 2675-2748)
- Exhibit 23 Gengler EEOC Charge (UHS/UHD 2304-2305)
- Exhibit 24 Exhibit 32 of Dean Gengler's Documents (UHS/UHD 2335-2348)
- Exhibit 25 Gengler's Lawsuit Against UHD
- Exhibit 26 Gengler's Resignation (UHS/UHD 1111)
- Exhibit 27 Appeal Dismissal (UHS/UHD 21477-21484)
- Exhibit 28 Marilyn Davies Declaration (UHS/UHD 2313-2314)
- Exhibit 29 Dr. Chuanlan Liu's Declaration (UHS/UHD 2322-2323)
- Exhibit 30 Dr. Gooden's EEOC Charge (UHS/UHD 004-006)
- Exhibit 31 Notice of Right to Sue (GOODEN 125-126)

Respectfully Submitted,

MOORE & ASSOCIATES

By: *Rochelle Owens*

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed via the Court's CM/ECF system on March 28, 2024, which caused an electronic copy of the same to be served upon all counsel of record.

A handwritten signature in black ink that reads "Rochelle Owens". The signature is written in a cursive, flowing style. The first name "Rochelle" is written with a large, prominent 'R' and the last name "Owens" follows in a similar cursive script.

Rochelle Owens